

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

D.V.D., *et al.*,

Individually and on behalf of all others
similarly situated,

Plaintiffs,

V.

U.S. Department of Homeland Security, *et al.*,

Defendants.

No. 1:25-cv-10676-BEM

UNOPPOSED MOTION FOR REMOTE APPEARANCE

Defendants, with consent of Plaintiffs' counsel, respectfully request that this Court permit undersigned counsel, Elianis N. Perez, to appear remotely by video link for the hearing scheduled on Thursday April 10, 2025. Good cause exists for this request.

Undersigned counsel for Defendants lives and works in Washington, D.C. and is currently scheduled for an international flight leaving Washington Reagan National Airport on Friday April 11, 2025, at 7 am. Appearing in-person would require cancelling this pre-scheduled international travel.¹ Counsel for Plaintiffs do not oppose this request.

For the reasons stated above, Defendants respectfully request that the Court grant this motion regarding appearing remotely for the hearings scheduled on April 10, 2025.

¹ Defendants' Counsel Mary Larakers and Matthew Seamon will appear in-person.

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General

DREW ENSIGN
Deputy Assistant Attorney General

Dated: April 7, 2025

/s/Elianis N. Perez
ELIANIS N. PEREZ
Assistant Director
U.S. Department of Justice, Civil Division
Office of Immigration Litigation—
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
(202) 616-9124
(202) 305-7000 (facsimile)
Elianis.perez@usdoj.gov

CERTIFICATE OF SERVICE

I, Elianis N. Perez, Assistant Director, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: April 7, 2025

/s/ Elianis N. Perez
ELIANIS N. PEREZ
Assistant Director
U.S. Department of Justice
Civil Division
Office of Immigration Litigation-
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
(202) 616-9124
(202) 305-7000 (facsimile)
Elianis.Perez@usdoj.gov